## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA MACON DIVISION

KATHY HALL-GORDON,	)
Plaintiff,	)
v.	) CIVIL ACTION NO. 5:21-CV-143
BIBB COUNTY SCHOOL DISTRICT,	)
Defendant.	) )

## **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant Bibb County School District, pursuant to Federal Rule of Civil Procedure 56, moves the Court to enter summary judgment on all claims brought by Kathy Hall-Gordon as asserted in her Complaint. A more particular statement of the grounds for this motion is set forth in Defendant's Brief in Support of Motion for Summary Judgment and the Statement of Material Facts, filed contemporaneously.

This motion is based upon all of the pleadings, records, and proceedings in this action, Defendant's Brief in Support of Motion for Summary Judgment, the Statement of Material Facts, the Declaration of Melva Sullivent, and the Declaration of Rose Powell along with its supporting exhibits, submitted herewith.

/s/ Thomas W. Joyce
THOMAS W. JOYCE
State Bar No. 405527
WILLIAM B. MCDAVID, Jr.
State Bar No. 315114
JONES CORK, LLP
435 Second Street, Suite 500
P.O. Box 6437
Macon, GA 31208-6437
(478) 745-2821

## **CERTIFICATE OF SERVICE**

I, William B. McDavid, hereby certify that on May 20, 2022, I electronically filed the foregoing document DEFENDANT'S MOTION FOR SUMMARY JUDGMENT, BRIEF, STATEMENT OF MATERIAL FACT AND ALL SUPPORTING MATERIALS with the Clerk of Court using the CM/ECF system which will send notifications of such filing to all attorneys of record via electronic mail upon:

Kenneth E. Barton III Cooper, Barton & Cooper, LLP 170 College Street Macon, Georgia 31201 478-841-9007 keb@cooperbarton.com

/s/ Thomas W. Joyce
THOMAS W. JOYCE
JONES CORK, LLP
435 Second Street, Suite 500
P.O. Box 6437
Macon, GA 31208-6437
(478) 745-2821